



# Office of Public Utility Counsel

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**DOCKET FILE COPY ORIGINAL**

March 3, 1998

M. R. Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

RE: CC Docket No. 96-45  
AAD/USB File No. 98-37  
PaReconsideration Petition  
Comment of the Texas Office of the Public Utility Counsel

RECEIVED  
FCC MAIL ROOM  
MAR 4 1998

Dear Ms. Salas:

On behalf of the Texas Office of the Public Utility Counsel, I am filing this Comment in Support of the Combined Joint Petition filed by the Pennsylvania Public Utility Commission. In accordance with the filing instructions provided in Notice DA 98-293 and 47 C.F.R. §§1.49, 1.415 and 1.419, copies are being provided for distribution as follows:

Commissioners	5
Secretary (Original and 1 copy)	2
Common Carrier Bureau	2
Information Office	1
Pamela Gallante (Common Carrier)	1
Irene Flannery (Universal Service)	1
Sheryl Todd (Universal Service)	1
ITS	2
Copy to be returned to Texas OPUC	1.

Please return the enclosed 16<sup>th</sup> copy of our comments to this office with a file stamp acknowledging receipt.

In addition, a copy of the comment is being forwarded to the Pennsylvania Public Utility Commission in Harrisburg, Pa.

Sincerely,

No. of Copies rec'd 04/5  
List ABCDE

*Rick Guzman*

Rick Guzman  
Assistant Public Counsel  
Texas Office of the Public Utility Counsel

CC Docket No. 96-45  
AAD/USB File No. 98-36

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CC Docket No. 96-45  
AAD/USB File No. 98-36  
PaPUC Reconsideration Petition  
Comments of the Texas OPUC

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

\_\_\_\_\_  
In the Matter of )  
\_\_\_\_\_)  
Federal-State Joint Board on )  
\_\_\_\_\_)  
Universal Service )

CC Docket No. 96-45  
AAD/USB File No. 98-36

**COMMENT OF THE TEXAS OFFICE OF THE PUBLIC  
UTILITY COUNSEL IN SUPPORT OF THE COMBINED  
PETITION FOR RECONSIDERATION OF THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**I. INTRODUCTION**

Pursuant to FCC Public Notice DA 98-293 released on February 13, 1998, the Texas Office of the Public Utility Counsel (Texas OPUC) submits these comments in support of the Combined Petition for Reconsideration of the Pennsylvania Public Utility Commission (PaPUC Combined Petition). This comment further incorporates other comments and reply comments filed in support of the PaPUC Combined Petition to the extent they are consistent with this comment.

## II. BACKGROUND

2. On January 2, 1998, the Commission's Common Carrier Bureau (CCB or Bureau) issued a Memorandum Opinion and Order (Pennsylvania Decision) denying the PaPUC's request for a waiver from the definition of "rural area" contained in Section 54.5 of the Commission's rules. The PaPUC submitted a PaPUC Combined Petition urging the CCB to reconsider that prior determination and grant alternative relief.

3. Section 254(b)(2) of the TA-96 generally requires that the cost for telecommunications be just, reasonable, and affordable. Sections 254(b)(2) and (b)(3) of the TA-96 also require that services be provided to all regions of the Nation and that services be provided to rural areas at a level of quality and at a price comparable to that provided for similar services in urban areas.

4. Section 254(h)(1)(A) of the Telecommunications Act of 1934, as amended, requires the Commission to adopt a definition of "rural area" to determine the location of health care providers eligible for universal service support and to determine the "comparable rural areas" used to calculate the credit or reimbursement provided to a telecommunications carrier that provides telecommunications services to health care providers at reduced cost. The discount

for health care providers can be secured only if the health care provider is located in a rural area. Section 254(h)(1)(B) provides a discount for schools and libraries although there is an additional discount for schools and libraries in rural areas.

5. The trigger for the discounts is whether the rural area meets the FCC's definition. The FCC's definition relies upon the Office of Management and Budget's (OMB) list of Metropolitan Statistical Areas (MSAs), and census blocks or tracts in metropolitan counties identified by the Goldsmith Modification (the OMB-Goldsmith definition). In the absence of a waiver from that definition, a rural county cannot acquire the rural health care discount nor the additional discount for schools and libraries.

6. In 1997, the PaPUC submitted a request for a waiver from the OMB-Goldsmith definition on behalf of nine Pennsylvania counties. The PaPUC request rested on, among other things, a significantly lower primary care physician-to-population ratio, a significantly higher proportion of residents living within designated areas of medical under-service, and significantly fewer hospitals and hospital beds.

7. The PaPUC bolstered the waiver request with a showing that the cost to the federal universal service program was miniscule. The cost of adding the affected 46 health care

providers in the nine rural counties would only add an estimated \$475,087 (or less than 2/10 of one percent of the \$400 million allocated for the health care program). The PaPUC further bolstered the waiver request by showing that the cost to include the 317 schools in the nine rural counties adds only \$544,555 (or less than 3/100 of one percent of the \$2.25 billion allocated for schools and libraries).

### **III. TEXAS OPUC POSITION**

8. The Texas OPUC supports the PaPUC Combined Petition because it contains new and relevant supplemental evidence, not reasonably discoverable at the time of the initial pleadings, sufficient to warrant reconsideration under the law and the Commission's regulations. The Texas OPUC is particularly concerned about the disproportionate impact that denying the PaPUC Combined Petition will have on counties in Texas, and by extension on residential consumers in those counties. The Texas OPUC believes that this constitutes new and relevant supplemental evidence substantially likely to affect the implementation of Sections 254(b) and 254(h) of the TA-96.<sup>1</sup>

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<sup>1</sup>See 47 C.F.R. §1.106; W.S. Butterfield Theatres, Inc. v. Federal Communications Commission, 99 App DC 71, 237 F.2d 552 (1956); Re Armond J. Rolle, 31 FCC2d 553 (1971).

9. The Texas OPUC also files these comments in support of the PaPUC Combined Petition because Pennsylvania has shown new circumstances, developed in more detail below, demonstrating that the FCC's Pennsylvania Decision never explained in detail what evidence the states must show to establish the "special circumstances" necessary to securing a waiver from the OMB-Goldsmith definition. The FCC should reconsider and analyze the PaPUC's new evidence to remedy this lack of detail. Otherwise, the states will be unable to discern when, and under what circumstances, they could seek a waiver from the FCC's narrow definition of "rural areas" for purposes of the Telecommunications Act of 1996.

10. The Texas OPUC also supports the PaPUC Combined Petition because of the new claim, not capable of being raised before, that the Pennsylvania Decision and the FCC's current definition imposes an inadvertent, but very real, inequity and hardship on several, otherwise rural, counties. The initial PaPUC Combined Petition shows that 177 of 229 counties eligible for a waiver under the PaPUC Combined Petition are located east of the Mississippi. The PaPUC's initial filing shows that 24 of the remaining 52 counties are concentrated in three states west of the Mississippi i.e., Texas, Louisiana and Missouri. Twenty-two of these affected counties are in Texas.

This disproportionate impact is underscored with recent supplemental information filed by the PaPUC in support of the PaPUC Combined Petition. The Supplemental Information shows that there are 325 counties eligible for a waiver as suggested by the PaPUC Combined Petition and that 22 of the eligible counties, or 7% of the total, are concentrated in Texas. Texas OPUC does not believe that such a disproportionate impact was intended by the Congress.

11. In particular, Texas OPUC is concerned that the 22 counties in Texas be able to request a waiver from the FCC's definition and thereby secure the benefits intended for rural Texans under the Telecommunications Act of 1996. In support of that position, the Texas OPUC has attached Appendix A showing the number of counties in our state that could be eligible for a waiver if the FCC endorsed the proposal in the PaPUC Combined Petition. Moreover, the Texas OPUC also attaches an appendix showing that the cost of providing the schools and libraries and health care discounts to the 22 affected Texas counties would be 0.3 % of the \$2.5 billion budgeted for schools and libraries and 0.3 % of the \$400,000,000 budgeted for rural health care. In addition, the Texas OPUC does not believe that this flexibility constitutes a national floodgate because the cost of providing the discounts to every affected county in every state that might conceivably be eligible under the four-part Pennsylvania test is only 5% of the total \$2.5 billion budgeted for schools and libraries, and 4% of the \$400,000,000 budgeted for rural health care.



These claims are based on nationally available 1990 Census Bureau definitions and data. See Appendix A, Appendix B, Appendix B-1, Appendix C, and Appendix C-1.

12. The Texas OPUC further supports the PaPUC Combined Petition because the matter can be simply remedied. The Texas OPUC supports the PaPUC claim that new evidence, not capable of being raised before, shows that the omissions, the absence of detail in the Pennsylvania Decision about what constitutes special circumstances, and the hardship and inequity suggested by the PaPUC Combined Petition and these comments can be remedied by simply granting the PaPUC Combined Petition. By endorsing the proposed four-part test for waiver requests under Section 251(h) of the Act, the FCC can avoid protracted litigation.

13. The Texas OPUC supports the PaPUC's proposed four-part test for guiding current and future requests for waivers from the OMB-Goldsmith definition. Under the test, Texas would be expected to show: (1) a county is less than 50% urbanized as defined by the U.S. Census Bureau; (2) that each county contains no "central city" as defined by the US Census Bureau; (3) the existence of prior commitments to the county, such as education or health care initiatives, based on the county's rural status; and (4) other corroborating evidence that tended to establish that the county was different from an urban county. States able to make these showings would be granted a waiver from the OMB-Goldsmith definition as a "modified non-urbanized"

exception to the general definition. The Texas OPUC believes that this test should be adopted because it enhances predictability and is not burdensome to administer.

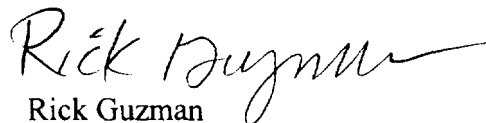
14. The Texas OPUC believes that the nine counties in Pennsylvania meet the criteria of “modified non-urbanized” rural areas based on 1990 Census Bureau definitions and data. Each of the nine counties has a population that is less than 50% urbanized and no county possesses a central city. In addition, Pennsylvania has shown that it developed initiatives before the Act that focus on the challenges facing these rural counties. Each county contains school districts that do not meet the definition of urban school districts and the counties have designated health care shortage areas. Pennsylvania submitted corroborating evidence showing that these counties contain rural telcos, as defined under the Act, and that all nine rural counties pay higher T-1 rates, compared to urban counties, to obtain the basic and advanced telecommunications envisioned by the Act.

15. Finally, the Texas OPUC is very concerned about this proceeding because the CCB’s decision here has profound impact on the 22 counties in Texas that are eligible to seek the same waiver that Pennsylvania now seeks. The Texas OPUC believes that it could make a similar showing based on these criteria and that the disproportionate impact under the rigid definition developed by the FCC operates to the detriment of affected rural Texans.

#### IV. CONCLUSION

The Texas OPUC urges the Commission to grant the PaPUC Combined Petition and use the non-binding waiver criteria set forth in the Petition to grant Pennsylvania the relief requested and to provide guidance to other states on what considerations would justify a waiver from the OMB-Goldsmith definition.

Respectfully submitted,



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APPENDIX A TEXAS COUNTIES POTENTIALLY AFFECTED BY PENNSYLVANIA WAIVER CRITERIA: 1995  
ESTIMATE BY THE CENTER FOR RURAL PENNSYLVANIA AND THE PAPUC

METROPOLITAN COUNTIES THAT ARE LESS THAN 50% URBANIZED AND DO NOT CONTAIN A CENTRAL CITY METROPOLITAN COUNTIES DESIGNATION, 1995

State Name	MSA Code	FIBS Code	County Name	Total Population, 1990	Urbanized Population, 1990	% Urbanized
Texas	9080	008424	Archer County	7,973	911	11%
Texas	0640	008430	Bastrop County	38,263	0	0%
Texas	0640	008447	Caldwell County	26,392	0	0%
Texas	3362	008455	Chambers County	20,088	2,712	14%
Texas	7240	008465	Comal County	51,832	157	0%
Texas	1922	008489	Ellis County	85,167	48	0%
Texas	7240	008513	Guadalupe County	64,873	13,038	20%
Texas	0840	008519	Hardin County	41,320	8,415	20%
Texas	1922	008526	Henderson County	58,543	0	0%
Texas	1922	008530	Hood County	28,981	0	0%
Texas	1922	008535	Hunt County	64,343	0	0%
Texas	1922	008545	Johnson County	97,165	0	0%
Texas	1922	008548	Kaufman County	52,220	0	0%
Texas	3362	008565	Liberty County	52,726	0	0%
Texas	3362	008589	Montgomery County	182,201	54	0%
Texas	0840	008600	Orange County	80,509	0	0%
Texas	1922	008603	Parker County	64,785	1,240	2%
Texas	1880	008624	San Patricio County	58,749	12,208	21%
Texas	4420	008649	Upshur County	31,370	0	0%
Texas	3362	008656	Waller County	23,390	797	3%
Texas	0640	008665	Williamson County	139,551	41,865	30%
Texas	7240	008666	Wilson County	22,650	0	0%

# **APPENDIX B, CORRECTED, FEBRUARY 20, 1998** **ESTIMATED METRO/NONMETRO COUNTIES UNDER WAIVER CRITERIA**

CENTER FOR RURAL PENNSYLVANIA, 212 LOCUST STREET, SUITE 604, HARRISBURG, PA 17101 (717) 787-9555

	TOTAL # COUNTIES	METRO / NONMETRO DEFINITION		TOTAL # COUNTIES	POTENTIAL WAIVER CRITERIA COUNTIES		# WAIVER CRITERIA RURAL COUNTIES MINUS # NONMETRO COUNTIES
		# Metro Counties	# Nonmetro Counties		# Urban Counties	# Rural Counties	
United States	3,142	841	2,301	3,142	516	2,626	325
Alabama	67	21	46	67	14	53	7
Alaska	26	1	25	26	1	25	0
Arizona	15	6	9	15	4	11	2
Arkansas	75	11	64	75	6	69	5
California	58	34	24	58	31	27	3
Colorado	63	11	52	63	10	53	1
Connecticut	8	6	2	8	5	3	1
Delaware	3	2	1	3	2	1	0
District of Columbia	1	1	0	1	1	0	0
Florida	67	34	33	67	28	39	6
Georgia	159	42	117	159	16	143	26
Hawaii	5	1	4	5	1	4	0
Idaho	44	2	42	44	1	43	1
Illinois	102	28	74	102	17	85	11
Indiana	92	37	55	92	16	76	21
Iowa	99	10	89	99	8	91	2
Kansas	105	9	96	105	5	100	4
Kentucky	120	22	98	120	9	111	13
Louisiana	64	24	40	64	12	52	12
Maine	16	3	13	16	3	13	0
Maryland	24	15	9	24	9	15	6
Massachusetts	14	11	3	14	10	4	1
Michigan	83	25	58	83	14	69	11
Minnesota	87	18	69	87	9	78	9
Mississippi	82	9	73	82	5	77	4
Missouri	115	22	93	115	10	105	12
Montana	57	2	55	57	2	55	0
Nebraska	93	6	87	93	4	89	2
Nevada	17	3	14	17	2	15	1
New Hampshire	10	3	7	10	2	8	1
New Jersey	21	21	0	21	16	5	5
New Mexico	33	6	27	33	4	29	2
New York	62	38	24	62	24	38	14
North Carolina	100	35	65	100	18	82	17
North Dakota	53	4	49	53	4	49	0
Ohio	88	39	49	88	20	68	19
Oklahoma	77	14	63	77	7	70	7
Oregon	36	9	27	36	6	30	3
Pennsylvania	67	33	34	67	24	43	9
Rhode Island	5	4	1	5	3	2	1
South Carolina	46	16	30	46	12	34	4
South Dakota	66	3	63	66	3	63	0
Tennessee	95	26	69	95	9	86	17
Texas	254	58	196	254	36	218	22
Utah	29	5	24	29	4	25	1
Vermont	14	3	11	14	1	13	2
Virginia	136	62	74	136	33	103	29
Washington	39	12	27	39	11	28	1
West Virginia	55	12	43	55	7	48	5
Wisconsin	72	20	52	72	15	57	5
Wyoming	23	2	21	23	2	21	0

**APPENDIX B-1, CORRECTED, FEBRUARY 20, 1998**

**ESTIMATED METRO/NONMETRO COUNTIES USING WAIVER CRITERIA FOR STATES EAST AND WEST OF THE MISSISSIPPI RIVER**

CENTER FOR RURAL PENNSYLVANIA, 212 LOCUST STREET, SUITE 604, HARRISBURG, PA 17101 (717) 787-9555

	TOTAL # COUNTIES	METRO / NONMETRO DEFINITION		TOTAL # COUNTIES	POTENTIAL WAIVER CRITERIA COUNTIES		# WAIVER CRITERIA RURAL COUNTIES MINUS # NONMETRO COUNTIES
		# Metro Counties	# Nonmetro Counties		# Urban Counties	# Rural Counties	
<b>STATES EAST OF THE MISSISSIPPI RIVER</b>							
Alabama	67	21	46	67	14	53	7
Connecticut	8	6	2	8	5	3	1
Delaware	3	2	1	3	2	1	0
District of Columbia	1	1	0	1	1	0	0
Florida	67	34	33	67	28	39	6
Georgia	159	42	117	159	16	143	26
Illinois	102	28	74	102	17	85	11
Indiana	92	37	55	92	16	76	21
Kentucky	120	22	98	120	9	111	13
Maine	16	3	13	16	3	13	0
Maryland	24	15	9	24	9	15	6
Massachusetts	14	11	3	14	10	4	1
Michigan	83	25	58	83	14	69	11
Mississippi	82	9	73	82	5	77	4
New Hampshire	10	3	7	10	2	8	1
New Jersey	21	21	0	21	16	5	5
New York	62	38	24	62	24	38	14
North Carolina	100	35	65	100	18	82	17
Ohio	88	39	49	88	20	68	19
Pennsylvania	67	33	34	67	24	43	9
Rhode Island	5	4	1	5	3	2	1
South Carolina	46	16	30	46	12	34	4
Tennessee	95	26	69	95	9	86	17
Vermont	14	3	11	14	1	13	2
Virginia	136	62	74	136	33	103	29
West Virginia	55	12	43	55	7	48	5
Wisconsin	72	20	52	72	15	57	5
<b>Total for States East of the Mississippi River</b>	<b>1,069</b>	<b>568</b>	<b>1,041</b>	<b>1,069</b>	<b>333</b>	<b>1,276</b>	<b>235</b>

**APPENDIX B-1, CORRECTED, FEBRUARY 20, 1998**  
**CONTINUED**

CENTER FOR RURAL PENNSYLVANIA, 212 LOCUST STREET, SUITE 604, HARRISBURG, PA 17101 (717) 787-9555

	TOTAL # COUNTIES	METRO / NONMETRO DEFINITION		TOTAL # COUNTIES	POTENTIAL WAIVER CRITERIA COUNTIES		# WAIVER CRITERIA RURAL COUNTIES MINUS # NONMETRO COUNTIES
		# Metro Counties	# Nonmetro Counties		# Urban Counties	# Rural Counties	
STATES WEST OF THE MISSISSIPPI RIVER							
Alaska	26	1	25	26	1	25	0
Arizona	15	6	9	15	4	11	2
Arkansas	75	11	64	75	6	69	5
California	58	34	24	58	31	27	3
Colorado	63	11	52	63	10	53	1
Hawaii	5	1	4	5	1	4	0
Idaho	44	2	42	44	1	43	1
Iowa	99	10	89	99	8	91	2
Kansas	105	9	96	105	5	100	4
Louisiana	64	24	40	64	12	52	12
Minnesota	87	18	69	87	9	78	9
Missouri	115	22	93	115	10	105	12
Montana	57	2	55	57	2	55	0
Nebraska	93	6	87	93	4	89	2
Nevada	17	3	14	17	2	15	1
New Mexico	33	6	27	33	4	29	2
North Dakota	53	4	49	53	4	49	0
Oklahoma	77	14	63	77	7	70	7
Oregon	36	9	27	36	6	30	3
South Dakota	66	3	63	66	3	63	0
Texas	254	58	196	254	36	218	22
Utah	29	5	24	29	4	25	1
Washington	39	12	27	39	11	28	1
Wyoming	23	2	21	23	2	21	0
Total for States West of the Mississippi River	1,533	273	1,260	1,533	183	1,350	90

**APPENDIX C, CORRECTED, FEBRUARY 20, 1998**  
**ESTIMATE OF DISCOUNT COSTS UNDER WAIVER CRITERIA**

	Total United States	States East of Mississippi River	States West of Mississippi River
<b>METRO/NONMETRO COUNTIES</b>			
# Metro Counties	841	568	273
# Nonmetro Counties	2,301	1,041	1,260
<b>POTENTIAL WAIVER COUNTIES</b>			
# Urban Counties	516	333	183
# Rural Counties	2,626	1,276	1,350
<b>ELIGIBLE COUNTIES</b>			
Counties Eligible for Waiver	325	235	90
<b>SCHOOLS AND LIBRARIES PROGRAM</b>			
Avg. Discount Loss of Pennsylvania Waiver Counties	\$373,891	\$373,891	\$373,891
Total Discount Loss for Counties Eligible for Waiver	\$121,514,575	\$87,864,385	\$33,650,190
Total Estimated Discount for Schools and Libraries	\$2,500,000,000	\$2,500,000,000	\$2,500,000,000
Increase in Schools and Library Discount Program as % of the National Program Costs	4.9%	3.5%	1.3%
<b>RURAL HEALTH CENTER PROGRAM</b>			
Avg. Discount Loss of Pennsylvania Waiver Counties in Rural Health Program	\$52,787	\$52,787	\$52,787
Total Discount Loss for Counties Eligible for Waiver	\$17,155,775	\$12,404,945	\$4,750,830
Total Estimated Health Center Discount	\$400,000,000	\$400,000,000	\$400,000,000
Increase in Discount Program Cost as % of National Program Costs	4.3%	3.1%	1.2%



**APPENDIX C-1, CORRECTED, FEBRUARY 20, 1998**  
**ESTIMATE OF DISCOUNT COST BY STATE UNDER WAIVER CRITERIA**

	# Waiver Counties Minus # Non Metro Counties	SCHOOLS AND LIBRARIES PROGRAM				RURAL HEALTH CENTER PROGRAM			
		Avg. Discount Loss of Pennsylvania Waiver Counties	Total Discount Loss for Counties Eligible for Waiver	Total Estimated Discount for Schools and Libraries	Increase in Schools and Library Discount Program as % of the National Program Costs	Avg. Discount Loss of Pennsylvania Waiver Counties in Rural Health Center in Counties Eligible for Waiver	Total Discount Loss for Counties Eligible for Waiver	Total Estimated Health Center Discount	Increase in Discount Program Cost as % of National Program Costs
United States	325	\$373,891	\$121,514,575	\$2,500,000,000	4.9%	\$52,787	\$17,155,775	\$400,000,000	4.3%
Alabama	7	\$373,891	\$2,617,237	\$2,500,000,000	0.1%	\$52,787	\$369,509	\$400,000,000	0.1%
Connecticut	1	\$373,891	\$373,891	\$2,500,000,000	0.0%	\$52,787	\$52,787	\$400,000,000	0.0%
Delaware	0	\$373,891	\$0	\$2,500,000,000	0.0%	\$52,787	\$0	\$400,000,000	0.0%
District of Columbia	0	\$373,891	\$0	\$2,500,000,000	0.0%	\$52,787	\$0	\$400,000,000	0.0%
Florida	6	\$373,891	\$2,243,346	\$2,500,000,000	0.1%	\$52,787	\$316,722	\$400,000,000	0.1%
Georgia	26	\$373,891	\$9,721,186	\$2,500,000,000	0.4%	\$52,787	\$1,372,482	\$400,000,000	0.3%
Illinois	11	\$373,891	\$4,112,801	\$2,500,000,000	0.2%	\$52,787	\$580,657	\$400,000,000	0.1%
Indiana	21	\$373,891	\$7,851,711	\$2,500,000,000	0.3%	\$52,787	\$1,108,527	\$400,000,000	0.3%
Kentucky	13	\$373,891	\$4,860,583	\$2,500,000,000	0.2%	\$52,787	\$686,231	\$400,000,000	0.2%
Maine	0	\$373,891	\$0	\$2,500,000,000	0.0%	\$52,787	\$0	\$400,000,000	0.0%
Maryland	6	\$373,891	\$2,243,346	\$2,500,000,000	0.1%	\$52,787	\$316,722	\$400,000,000	0.1%
Massachusetts	1	\$373,891	\$373,891	\$2,500,000,000	0.0%	\$52,787	\$52,787	\$400,000,000	0.0%
Michigan	11	\$373,891	\$4,112,801	\$2,500,000,000	0.2%	\$52,787	\$580,657	\$400,000,000	0.1%
Mississippi	4	\$373,891	\$1,495,564	\$2,500,000,000	0.1%	\$52,787	\$211,148	\$400,000,000	0.1%
New Hampshire	1	\$373,891	\$373,891	\$2,500,000,000	0.0%	\$52,787	\$52,787	\$400,000,000	0.0%
New Jersey	5	\$373,891	\$1,869,455	\$2,500,000,000	0.1%	\$52,787	\$263,935	\$400,000,000	0.1%
New York	14	\$373,891	\$5,234,474	\$2,500,000,000	0.2%	\$52,787	\$739,018	\$400,000,000	0.2%
North Carolina	17	\$373,891	\$6,356,147	\$2,500,000,000	0.3%	\$52,787	\$897,379	\$400,000,000	0.2%
Ohio	19	\$373,891	\$7,103,929	\$2,500,000,000	0.3%	\$52,787	\$1,002,953	\$400,000,000	0.3%
Pennsylvania	9	\$373,891	\$3,365,019	\$2,500,000,000	0.1%	\$52,787	\$475,083	\$400,000,000	0.1%
Rhode Island	1	\$373,891	\$373,891	\$2,500,000,000	0.0%	\$52,787	\$52,787	\$400,000,000	0.0%
South Carolina	4	\$373,891	\$1,495,564	\$2,500,000,000	0.1%	\$52,787	\$211,148	\$400,000,000	0.1%
Tennessee	17	\$373,891	\$6,356,147	\$2,500,000,000	0.3%	\$52,787	\$897,379	\$400,000,000	0.2%
Vermont	2	\$373,891	\$747,782	\$2,500,000,000	0.0%	\$52,787	\$105,574	\$400,000,000	0.0%
Virginia	29	\$373,891	\$10,642,839	\$2,500,000,000	0.4%	\$52,787	\$1,530,823	\$400,000,000	0.4%
West Virginia	5	\$373,891	\$1,869,455	\$2,500,000,000	0.1%	\$52,787	\$263,935	\$400,000,000	0.1%
Wisconsin	5	\$373,891	\$1,869,455	\$2,500,000,000	0.1%	\$52,787	\$263,935	\$400,000,000	0.1%
Alaska	0	\$373,891	\$0	\$2,500,000,000	0.0%	\$52,787	\$0	\$400,000,000	0.0%
Arizona	2	\$373,891	\$747,782	\$2,500,000,000	0.0%	\$52,787	\$105,574	\$400,000,000	0.0%
Arkansas	5	\$373,891	\$1,869,455	\$2,500,000,000	0.1%	\$52,787	\$263,935	\$400,000,000	0.1%
California	3	\$373,891	\$1,121,673	\$2,500,000,000	0.0%	\$52,787	\$158,361	\$400,000,000	0.0%
Colorado	1	\$373,891	\$373,891	\$2,500,000,000	0.0%	\$52,787	\$52,787	\$400,000,000	0.0%
Hawaii	0	\$373,891	\$0	\$2,500,000,000	0.0%	\$52,787	\$0	\$400,000,000	0.0%
Idaho	1	\$373,891	\$373,891	\$2,500,000,000	0.0%	\$52,787	\$52,787	\$400,000,000	0.0%
Iowa	2	\$373,891	\$747,782	\$2,500,000,000	0.0%	\$52,787	\$105,574	\$400,000,000	0.0%
Kansas	4	\$373,891	\$1,495,564	\$2,500,000,000	0.1%	\$52,787	\$211,148	\$400,000,000	0.1%
Louisiana	12	\$373,891	\$4,486,692	\$2,500,000,000	0.2%	\$52,787	\$633,444	\$400,000,000	0.2%
Minnesota	9	\$373,891	\$3,365,019	\$2,500,000,000	0.1%	\$52,787	\$475,083	\$400,000,000	0.1%
Missouri	12	\$373,891	\$4,486,692	\$2,500,000,000	0.2%	\$52,787	\$633,444	\$400,000,000	0.2%
Montana	0	\$373,891	\$0	\$2,500,000,000	0.0%	\$52,787	\$0	\$400,000,000	0.0%
Nebraska	2	\$373,891	\$747,782	\$2,500,000,000	0.0%	\$52,787	\$105,574	\$400,000,000	0.0%
Nevada	1	\$373,891	\$373,891	\$2,500,000,000	0.0%	\$52,787	\$52,787	\$400,000,000	0.0%
New Mexico	2	\$373,891	\$747,782	\$2,500,000,000	0.0%	\$52,787	\$105,574	\$400,000,000	0.0%
North Dakota	0	\$373,891	\$0	\$2,500,000,000	0.0%	\$52,787	\$0	\$400,000,000	0.0%
Oklahoma	7	\$373,891	\$2,617,237	\$2,500,000,000	0.1%	\$52,787	\$369,509	\$400,000,000	0.1%
Oregon	3	\$373,891	\$1,121,673	\$2,500,000,000	0.0%	\$52,787	\$158,361	\$400,000,000	0.0%
South Dakota	0	\$373,891	\$0	\$2,500,000,000	0.0%	\$52,787	\$0	\$400,000,000	0.0%
Texas	22	\$373,891	\$8,225,602	\$2,500,000,000	0.3%	\$52,787	\$1,161,314	\$400,000,000	0.3%
Utah	1	\$373,891	\$373,891	\$2,500,000,000	0.0%	\$52,787	\$52,787	\$400,000,000	0.0%
Washington	1	\$373,891	\$373,891	\$2,500,000,000	0.0%	\$52,787	\$52,787	\$400,000,000	0.0%
Wyoming	0	\$373,891	\$0	\$2,500,000,000	0.0%	\$52,787	\$0	\$400,000,000	0.0%